

# **EXHIBIT LL**

# Estate of Michael O'Hanlon

# VCF Documentation



September 11th  
Victim Compensation Fund

May 20, 2019

MARGARET O'HANLON

[REDACTED]

Dear MARGARET O'HANLON:

The September 11th Victim Compensation Fund ("VCF") has reviewed your Eligibility Form. You submitted an Eligibility Form on behalf of MICHAEL O'HANLON. Your claim number is VCF0108183. Your Eligibility Form was determined to be substantially complete on May 17, 2019. As stated in the Regulations and on the claim form, by filing a substantially complete Eligibility Form, you have waived your right to file or be a party to a September 11th-related lawsuit on behalf of the decedent and his or her survivors.

#### **The Decision on your Claim**

The VCF has determined that the decedent has met the eligibility criteria established in the statute and regulations. Based on the information you submitted and information the VCF has received from the World Trade Center ("WTC") Health Program, the decedent has been found eligible for the following injuries:

- ASTHMA, UNSPECIFIED, UNSPECIFIED STATUS
- CANCER OF THE GASTROESOPHAGEAL JUNCTION
- CHRONIC RHINITIS
- ESOPHAGEAL REFLUX
- MALIGNANT NEOPLASM OF CARDIA
- OTHER CHRONIC BRONCHITIS
- SQUAMOUS CELL CARCINOMA OF SKIN, UNSPECIFIED

Please note that there are several reasons why an injury that you think should be eligible is not listed above. For non-traumatic injuries, the name of the injury is based on the information provided by the WTC Health Program and there may be different names for the same injury. Additionally, your injury may not be listed if it was only recently certified for treatment by the WTC Health Program.

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or the amount of your award.

#### **What Happens Next**

**If the decedent was certified for treatment by the WTC Health Program for a condition not listed above,** you should amend your claim. Please see the VCF website for details on how to



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amend your claim. The VCF will review the new information and determine if it provides the basis for a revised decision.

**If you believe the decedent had eligible injuries not treated by the WTC Health Program** and you would like the VCF to consider those injuries before calculating the amount of any compensation, you should amend your claim. If you choose to amend your claim, you will need to use the VCF Private Physician process. The Private Physician process is a way for the VCF to gather the required information about the decedent's treatment in order to process your claim. All forms are available on the VCF website under "Forms and Resources." The website also includes detailed information and instructions on the Private Physician process.

**If the decedent did not have injuries other than those listed above,** you should submit your Compensation Form and required supporting materials. If you have already submitted your Compensation Form, you do not need to take any action at this time unless you receive a request from the VCF for missing information. The VCF will calculate the amount of any compensation based on the conditions listed above after all compensation-related documents are submitted.

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya  
Special Master  
September 11th Victim Compensation Fund

cc: WENDELL TONG



September 11th  
Victim Compensation Fund

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June 2, 2020

MARGARET O'HANLON  
C/O WENDELL TONG  
SULLIVAN PAPAIN BLOCK MCGRATH & CANNAVO, PC  
120 BROADWAY 18TH FLOOR  
NEW YORK NY 10271

**Re: CLAIM NUMBER: VCF0108183**

Dear MARGARET O'HANLON:

The September 11th Victim Compensation Fund ("VCF") sent you a letter on August 16, 2019.

You then appealed the determination. The VCF has considered your appeal and has re-evaluated your claim for compensation. This letter sets forth the revised award and supersedes and replaces all previous letters.

Based on the information you provided in support of your appeal, the VCF has calculated the amount of your award as [REDACTED]. This determination is in accordance with the requirements of the Never Forget the Heroes: James Zadroga, Ray Pfeifer, and Luis Alvarez Permanent Authorization of the September 11th Victim Compensation Fund Act ("VCF Permanent Authorization Act"). The enclosed "Award Detail" includes a detailed explanation of the calculation and a list of the eligible conditions that were considered when calculating your award. This is the final decision on your appeal.

The VCF considered the totality of the record, including testimony and arguments presented during, and information provided in support of, your appeal hearing on October 1, 2019, and determined that your husband's disability retirement reclassification under the WTC Bill provides a basis for awarding future lost earnings starting at the date of approval on September 28, 2016. The VCF calculated a 100% loss and offset pension benefits accordingly. Replacement services were also awarded. No additional invoices or receipts were provided for the additional burial expenses. Therefore, the reimbursement amount was not increased. As explained at the hearing, PSOB benefits are offset in full regardless of beneficiary so the offset was not adjusted. The non-economic loss related to your husband's personal injury was already increased from [REDACTED], and no additional adjustments were made. The changes made to the award resulted in an increase to your overall award.

No non-routine legal service expenses are approved for reimbursement for this claim.

**What Happens Next**

The VCF will begin processing the payment on your claim using the information you provided on the VCF ACH Payment Information Form or other payment authorization document you submitted to the VCF. The Special Master will authorize the payment within 20 days of the



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date of this letter. Once the Special Master has authorized the payment, it may take up to three weeks for the United States Treasury to disburse the money into the designated bank account. **If your payment information has changed, you must call the VCF Helpline immediately at the number below.**

**Notifying the VCF of new Collateral Source Payments:** You must inform the VCF of any new collateral source payments you receive, or become entitled to receive, such as a change to your disability or survivor benefits, as this may change the amount of your award. If you notify the VCF within 90 days of learning of the new collateral source payment, your award will not be adjusted to reflect the new entitlement or payment. If you notify the VCF more than 90 days after learning of the new or revised entitlement or payment, the VCF may adjust your award to reflect the new payment as an offset, which may result in a lower award. If you need to notify the VCF of a new collateral source payment, please complete the "Collateral Offset Update Form" found under "Forms and Resources" on the [www.vcf.gov](http://www.vcf.gov) website.

Your award was calculated using our published regulations, and I believe it is fair and reasonable under the requirements of the VCF Permanent Authorization Act. As always, I emphasize that no amount of money can alleviate the losses suffered on September 11, 2001.

If you have any questions, please call our toll-free Helpline at 1-855-885-1555. Please have your claim number ready when you call: **VCF0108183**. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya  
Special Master  
September 11th Victim Compensation Fund

cc: MARGARET O'HANLON



September 11th  
Victim Compensation Fund

## Award Detail

Claim Number: VCF0108183  
Decedent Name: MICHAEL O'HANLON

<b>PERSONAL INJURY CLAIM (Losses up to Date of Death)</b>	
<b>Lost Earnings and Benefits</b>	
Loss of Earnings including Benefits and Pension	
Mitigating or Residual Earnings	\$0.00
<b>Total Lost Earnings and Benefits</b>	
<b>Offsets Applicable to Lost Earnings and Benefits</b>	
Disability Pension	
Social Security Disability Benefits	\$0.00
Workers Compensation Disability Benefits	\$0.00
Disability Insurance	\$0.00
Other Offsets related to Earnings	\$0.00
<b>Total Offsets Applicable to Lost Earnings</b>	
<b>Calculated Lost Earnings and Benefits after Offsets</b>	
<b>Total Lost Earnings and Benefits Awarded</b>	
<b>Other Economic Losses</b>	
Medical Expense Loss	\$0.00
Replacement Services	\$0.00
<b>Total Other Economic Losses</b>	\$0.00
<b>Total Economic Loss</b>	
<b>Total Non-Economic Loss</b>	
<b>Subtotal Award for Personal Injury Claim</b>	



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<b>DECEASED CLAIM (Losses from Date of Death)</b>	
<b>Loss of Earnings including Benefits and Pension</b>	[REDACTED]
<b>Offsets Applicable to Lost Earnings and Benefits</b>	
Survivor Pension	[REDACTED]
SSA Survivor Benefits	\$0.00
Worker's Compensation Death Benefits	\$0.00
Other Offsets related to Earnings	\$0.00
<b>Total Offsets Applicable to Loss of Earnings and Benefits</b>	[REDACTED]
<b>Calculated Lost Earnings and Benefits after Offsets</b>	
<b>Total Lost Earnings and Benefits Awarded</b>	\$0.00
<b>Other Economic Losses</b>	
Replacement Services	[REDACTED]
Burial Costs	[REDACTED]
<b>Total Other Economic Losses</b>	[REDACTED]
<b>Total Economic Loss</b>	[REDACTED]
<b>Non-Economic Loss</b>	
Non-Economic Loss - Decedent	[REDACTED]
Non-Economic Loss - Spouse/Dependent(s)	[REDACTED]
<b>Total Non-Economic Loss</b>	[REDACTED]
<b>Additional Offsets</b>	
Social Security Death Benefits	[REDACTED]
Life Insurance	[REDACTED]
Other Offsets	\$0.00
<b>Total Additional Offsets</b>	[REDACTED]
<b>Subtotal Award for Deceased Claim</b>	[REDACTED]



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<b>Subtotal of Personal Injury and Deceased Claims</b>	
PSOB Offset	[REDACTED]
Prior Lawsuit Settlement Offset	\$0.00
Award Paid on Prior Personal Injury Claim	[REDACTED]
<b>TOTAL AWARD</b>	[REDACTED]

<b>Factors Underlying Economic Loss Calculation</b>	
Annual Earnings Basis (without benefits)	[REDACTED]
Percentage of Disability attributed to Eligible Conditions - applicable to Personal Injury losses	100.00%
Start Date of Loss of Earnings Due to Disability - applicable to Personal Injury losses	09/28/2016

<b>Eligible Conditions Considered in Award</b>	
Asthma, Unspecified, Unspecified Status	
Cancer of The Gastroesophageal Junction	
Chronic Rhinitis	
Esophageal Reflux	
Malignant Neoplasm of Cardia	
Other Chronic Bronchitis	
Squamous Cell Carcinoma of Skin, Unspecified	

# Family Member Affidavits

Margaret O'Hanlon

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----- X  
RAYMOND ALEXANDER, et al.,

**AFFIDAVITO OF**  
**MARGARET**  
**O'HANLON**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK )  
: SS  
COUNTY OF  
WESTCHESTER )

Margaret O'Hanlon, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at  
[REDACTED]

2. I am currently 64 years old, having been born on [REDACTED]

3. I am the wife of Decedent, Michael O'Hanlon, upon whose death my claims are based. I submit this Affidavit in support of the present motion for a default money judgment for the claim made on behalf of my husband's estate and for my solatium claim. On September 28, 2018, I was issued Letters Testamentary as Executor of my husband's estate by the Westchester County Surrogate's Court.

4. My husband passed away from Stage IV Esophageal Cancer, metastatic to liver and stomach, on August 28, 2017, at the age of 59. It was medically determined that this illness

was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. My name is Margaret O'Hanlon, widow of FDNY Firefighter Michael O'Hanlon. At the age of 59, FDNY Firefighter Michael O'Hanlon died on August 28, 2017, of disease directly resulting from his time "on the pile" at Ground Zero in Lower Manhattan, NY. Mike worked at the remains of the World Trade Center from September 2001 to March 2002. It is impossible for me to adequately describe the heartache, pain, anguish, and devastation I felt on the day that Mike passed away and that I still carry with me 6 years later. Memories of our life together carry me through some of the darkest days. We often attended sporting events together. We were avid sports fans—me a Mets and NY Jets fan, him a Yankee and NY Giants fan—and the rivalry was real and so much fun. We often had barbecues in the yard with family and friends, hosted friends and family at St. Patrick's Day parties with Mike playing the accordion (he was an accomplished traditional Irish accordion player), and vacationed at the shore or in Ireland with our 3 children. We did many things together, and I hold those memories close to my heart. A very special memory that I am most thankful for is our daughter Katherine's wedding. Mike was sick and half the size he was before he became ill, but he never let anyone know that he wasn't feeling his best. He proudly walked her down the aisle, and then they shared a fabulous daddy/daughter dance. They swayed together around the dance floor, and then they did a two-handed Irish step dance. I will hold and love that memory forever. Ten months later, Mike passed away.

6. September 11, 2001, was the scariest day I have lived through as the wife of an FDNY firefighter. Mike was off that day. He went into work when he received an "all call" from the FDNY at 9:00 AM. I was glued to the TV, watching the events as they unfolded. I wasn't sure what was going to happen next, so I took my children out of school and brought them home. Whatever was to come, they were going to be with me. We prayed. We didn't see Mike for 2 weeks—he was either at the firehouse or Ground Zero. In the beginning, the firefighters were

determined to find survivors, and it was heartbreaking that that never happened. When not at Ground Zero for recovery, Mike attended funerals for those members who were lost that day. The emotional toll on him and us was tremendous. Mike worked on the recovery effort from September until the end of February or the beginning of March 2002.

7. Mike suffered from several different ailments: asthma, chronic rhinosinusitis, GERD, and sleep apnea. He had an inhaler and a CPAP machine at night, and he was prescribed omeprazole, 40 mg, and pantoprazole, 40 mg. Mike was diagnosed with esophageal cancer in May 2015. He received a chemotherapeutic regimen of carboplatin and paclitaxel and 7 weeks of radiation therapy from June 2015 to September 2015 at Memorial Sloan Kettering Cancer Center. On October 27, 2015, Mike underwent an esophagectomy; surgeons removed 50% of his esophagus and 40% of his stomach. The adverse effects of this surgery were severe. Mike had a feeding tube; he ate pureed/soft foods for several months. He suffered from stomach discomfort, nausea, and episodes of low blood sugar, when he sweated profusely and felt faint. This awful condition is called “dumping syndrome.” Because of the spontaneous nature of these frightening episodes, Mike could no longer be alone. I took a leave of absence from my job from October 26, 2015, to January 2016. Mike had a follow-up appointment with Dr. Jones in January 2016. At that time, the surgery was deemed a success. The feeding tube was removed. He was told to have small meals 3 to 4 times a day and to monitor his glucose, and we were told that his recovery should continue. We were prepared to live our lives with the new changes, thankful to have a healthy Mike. Dr. Jones would monitor him with a CT scan every 6 months.

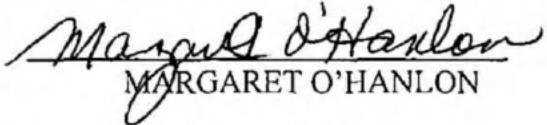
8. On June 20, 2016, the follow-up CT scan of his chest and abdomen found multiple new masses on his liver and stomach consistent with metastatic disease. On June 28, 2016, a biopsy report confirmed the esophageal adenocarcinoma had metastasized to his liver and stomach. His

oncologist informed us that it was an aggressive cancer that had no cure, but there was hope that they could abate the spreading. We were hopeful, and we prayed they could manage the cancer. We would face this together with an optimistic attitude. Mike was given another chemotherapy regimen, FOLFOX (leucovorin, fluorouracil [5-FU], and oxaliplatin). He had a port implanted in his chest, and he traveled to Memorial Sloan Kettering Westchester every other week for a 5-hour infusion. The chemotherapy infusion of 5-FU continued through his pump for the next 48 hours at home. We would then return to Memorial Sloan Kettering to have the pump disconnected. After the first few visits to Memorial Sloan Kettering, I was trained on how to disconnect the pump at home, so we did not need to travel back and forth to the hospital. We worked as a team, as we always did. I took another unpaid leave of absence from my job at the Lakeland Central School District from September 2016 to June 2017 to care for and spend time with my loving husband.

9. This treatment lasted 6 months, until the December 2017 PET scan showed it was no longer working. The new treatment available was the chemotherapy drug paclitaxel, which was given with ramucirumab, an immunotherapy drug. He agreed to anything and everything they offered to stay alive and be with his family. Our children (Katherine, Michael Jr, and Martin) would take turns taking him for treatments and spending time with their dad. Mike continued this treatment for several months. After treatments, Mike was completely exhausted. He had no energy and constant diarrhea and nausea. There would be good days and bad days, but he never gave up. Mike wasn't going to let the cancer define him. He lived life to the fullest, in the best way he could. He never complained, always had a positive attitude, and never wanted to show how much discomfort or pain he had.

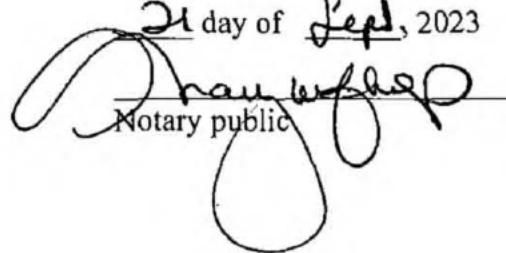
10. By April 2017, Mike could no longer do the things he loved, like playing golf with his sons and friends, going for bike rides or long walks, attending family outings, or playing the

not take a day for granted or miss a chance to tell my family and the people I hold close that I love them. I try to live life to the best of my ability as I honor Mike's memory and hold him in my heart.

  
MARGARET O'HANLON

Sworn before me this

21 day of Sept, 2023

  
Notary public

A. NANCY WULFHOP  
Notary Public, State of New York  
No. 01WU8103758  
Qualified in Putnam County  
Commission Expires 01/2024

Michael R. O'Hanlon, Jr.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

RAYMOND ALEXANDER, et al.,

----- X

AFFIDAVIT OF  
MICHAEL R.  
O'HANLON, JR.

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK )  
: SS  
COUNTY OF  
WESTCHESTER )

Michael R. O'Hanlon, Jr., being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at

[REDACTED]

2. I am currently 34 years old, having been born on [REDACTED]

3. I am the son of Decedent, Michael O'Hanlon, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.

4. My father passed away from Stage IV Esophageal Cancer, metastatic to liver and stomach, on August 28, 2017, at the age of 59. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. My father Michael O'Hanlon was a New York City firefighter who worked in the Bronx at Engine 68 near Yankee Stadium. My father was my best friend my entire life. Growing up, despite his occupation as a firefighter and having many days where he was away at work, he made sure to be at every big event in my life. He coached me in little league, basketball, and made almost every high school sporting event I had. He was my biggest support and pushed me to do the things I love and to practice and work hard at becoming the best I can be. He is a big reason for the person I am today. As a kid I would go to all the firehouse softball games, basketball games, and picnics with him. There were even a few times I went down to spend the day with him in the firehouse and watched him at work. I remember growing up being so incredibly proud and in awe of who he was. Spending those moments with him is what inspired me to pursue a career as a firefighter as well. I am currently a firefighter in the Bronx as well, at Ladder 59 on Sedwick Avenue in the Bronx.

6. As I got older my dad and I would play softball together on our local men's team. We would often play golf together at least once a week as well. One of our favorite things to do was to go to Yankee games both when I was a kid and as an adult. One of the last games we went to together was Derek Jeter's jersey retirement a few months before he passed, which was one of our favorite players throughout the Yankee Championship years. As a family growing up, we would spend every summer down at the Jersey Shore on Long Beach Island. We took several trips to Ireland as well to visit family and enjoy the country. The best times we spent together as we got older were on the golf course. It was there where not only were we both trying to figure out how to play a difficult game, but we were able to truly bond and connect on a more personal level other than father and

son. He was the guy I went to for everything in my life and the guy I relied upon for everything in my life. He truly was the absolute best father a kid could have asked for.

7. On 9/11 I remember I was in 7<sup>th</sup> grade in middle school sitting in class when the planes hit the towers. My mother came into my classroom and pulled me out and said we had to go home, but nothing else at first. We then collected my brother, and we went home. My sister was also taken out of school and brought home as well. My father that day wasn't working but as soon as the attacks happened, even before he FDNY gave the order calling all members in, he left to head to his firehouse Engine 68 in the Bronx to grab his gear and be ready to help at all costs. My father was sent down to assist in the recovery and rescue efforts that day, digging through the piles of rubble and tirelessly searching for any survivors they could find. I remember from that day on and for the next several weeks I didn't see my father as he did not return home. They spent that initial time sleeping at the firehouse and just rotating shifts, doing everything they could to find and recover anybody they could. I also remember not knowing if I would ever see my father again during that time. He did end up coming home thank God, but we knew we wouldn't be seeing very much of him after that. They spent the next several months to years down at Ground Zero, tirelessly working through debris, rubble, and even people. One thing I remember is they were told the air quality at WTC Ground Zero was entirely safe for them to operate, so they were told to continue to go down and assist in the rescue and recovery efforts at Ground Zero.

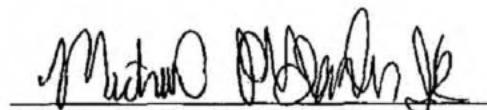
8. My father wasn't diagnosed until 2015 with WTC-related esophageal cancer. At the onset of illness, I remember specifically a lot of fear and anger of not wanting to lose my father. His initial rounds of treatment consisted of chemotherapy and radiation therapy to hopefully shrink the cancerous masses inside of him. Once the cancer shrunk, he underwent surgery to remove parts of his stomach and esophagus. He was initially determined to be cancer free at this point, but the

cancer came back and metastasized into his liver. This is where he began more rounds of chemotherapy and radiation treatment. Unfortunately, this time the treatments weren't working, and he passed away on August 28, 2017. Initially the diagnosis and the early rounds of treatments didn't really affect the quality of life too much. My father was a brave man, so he didn't let it get in the way of living his life. We still took trips down to Long Beach Island, New Jersey to spend time on the beach and see family. We still played plenty of golf and went to as many Yankees games as we could. He traveled some more with my mother. However, during the second round of treatments it really began taking its toll on him. He was losing function in his hand and was very tired, weak, and unable to even get through the day sometimes. He began to get very thin and fragile; he often needed our help to get up and go to the bathroom. We lost a lot of time with him as a result of his illness. He was 59 when he passed way too young. I still wish I could play one more game of golf with him or even just sit and hold a conversation with him.

9. My father was my best friend so when he was diagnosed, I was crushed. Anytime you hear the word cancer it almost always ends in them passing so I was terrified I was going to lose him. I tried so hard to remain positive during his illness, but I'll admit it was very difficult. I started to really isolate and distance myself every chance I had. I didn't know what to do or how to handle it. I ended up just pushing on and forcing myself to be strong for him and my family. He often was so positive throughout treatment, that I knew I needed to be too. When my dad passed, it was the most difficult thing I have ever had to endure. I was in complete denial and angry, very angry. Initially for me this is where things got worse. I was so angry and upset about losing him I completely shut down and closed myself off to a lot of people. I didn't want to be around or see anyone enjoying themselves. I didn't even want to continue to do a lot of the things I loved and enjoyed. I remember being very short tempered and angry for a while. The quality of my

relationships with both friends and family really took a hit. I didn't know how to be or how to act. It took me a good 2 to 3 years to finally start to be okay with the help of therapy and family and friends.

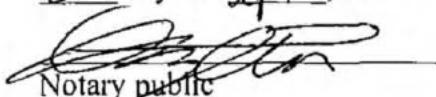
10. I'm never going to be fully okay with losing my father, but I am able to at least live my life a little today. I luckily was hired by the FDNY as well, so I take some solace that every day I am at work I am doing what he loved to do and what I now love to do, but it still hits you. I often need to find a moment to break down and cry every once in a while. I honestly don't think I will ever be the same or be fully healed because a very huge part of me and my life was my father. Every day I just continue to utilize all the good memories and qualities that he showed and gave to me. I'm engaged now and going to get married. Unfortunately, my father isn't here to be able to enjoy my wedding. He always loved a good party and gathering. I'm going to be starting a family. My father will never be able to meet my kids, his grandkids. When I talk about him to my future family, I will have to show them a picture of him. For lack of better words, it just really sucks. The things I will no longer be able to share or experience with him. The memories we are no longer able to make.



MICHAEL R. O'HANLON, JR.

Sworn before me this

22 day of Sept, 2023



Notary public

Catherine S Ahn  
Notary Public State of New York  
No. 01AH0004295  
Qualified in Westchester County  
Commission Expires 03/28/2027

Katherine M. Schlosser

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----- X  
RAYMOND ALEXANDER, et al.,

AFFIDAVITO OF  
KATHERINE M.  
SCHLOSSER

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK )  
: SS  
COUNTY OF  
WESTCHESTER )

Katherine M. Schlosser, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at [REDACTED]

2. I am currently 37 years old, having been born on [REDACTED]

3. I am the daughter of Decedent, Michael O'Hanlon upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.

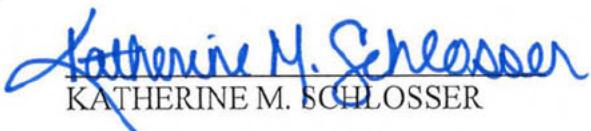
4. My father passed away from Stage IV Esophageal Cancer, metastatic to liver and stomach, on August 28, 2017, at the age of 59. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. My father and I were extremely close. I was a daddy's girl from the beginning. One of my favorite memories of daddy and I was when I was still Irish Step Dancing. He would play the accordion for me while I was practicing my steps. Whenever I would go do a feist, he would let the musicians know what songs I had practiced with, and they would play them. Irish Dancing was a big part of our lives and connection (daddy danced also) and at my wedding we were able to have one final Irish dance together as part of our father daughter dance. Irish music was a big part of our connection, and I used to love going to watch him play in an Irish music session. I miss listening to his music the most. We also shared a love of baseball and watching the Yankees. His firehouse was first due to Yankee Stadium (Engine 68 and Ladder 49 on 167th and Ogden Avenue). We would go to Yankee games with his firehouse all the time, or if we were going to the game without him when we got older, we would park at the firehouse, and they would drive us to the games in their Pinstriped engines. I can't watch baseball anymore because it makes me miss him too much.

6. I was 15 years old and in the 10th grade on September 11, 2001. I remember going to school that morning, and that dad was home. My mom was also home that day, but I don't remember why. I was sitting in my chemistry class when the news broke out about the Twin Towers, and all the school staff had announced was that something had happened in the city and that we were to remain calm. My mom came to pick me up from school after daddy was called in with the FDNY All Call. I don't specifically know what he was doing on the day of the terrorist attacks, but I remember that we didn't speak to him for days after. I don't remember how long he wasn't home for immediately following the attack, but I feel like we didn't see him for a week straight. He spent months following the attack doing rescue and recovery down at Ground Zero.

7. Daddy retired from the FDNY in 2013. In June of 2015, he was diagnosed with Stage IV Esophageal cancer. The onset of his illness was very sudden. In October 2015, he had surgery to remove 50% of his esophagus and 40% of his stomach. He was on a feeding tube for Thanksgiving and Christmas. Following this surgery, he underwent chemotherapy and radiation. In December of 2016, he was given a clean bill of health from his oncologists, and we celebrated by giving him a brand-new accordion. About three months later his cancer had metastasized to his liver. He continued with radiation and chemotherapy. In July 2017, the oncologists told him that there was nothing more that they could do for him with regards to treatment. He died in August of 2017.

8. To watch my father go from an extremely healthy man (runner, athlete), to someone so weak and fragile from chemotherapy was extremely depressing. To lose him to a 9/11 cancer was devastating. Since his death, I have experienced severe mental health issues, and have been diagnosed with Major Depressive Disorder, and Generalized Anxiety Disorder. I struggle daily with missing him, with wanting to speak to him, and being upset about all the things he is missing out on in my life, that he should be here for.

  
KATHERINE M. SCHLOSSER

Sworn before me this

9<sup>th</sup> day of Jan, 2024

Katie Wiltshire  
Notary public

